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31 Plaintiffs BrandTotal, Ltd. and Unimania, Inc.

32 **UNITED STATES DISTRICT COURT**
33 **NORTHERN DISTRICT OF CALIFORNIA**
34 **SAN FRANCISCO/OAKLAND DIVISION**

35 FACEBOOK, INC., a Delaware
36 corporation,

37 Case No.: 3:20-CV-07182-JCS

38 Plaintiff/Counterclaim
39 Defendant,

40 v.
41 **ADMINISTRATIVE MOTION TO FILE**
42 **DISCOVERY DISPUTE LETTER BRIEF**
43 **AND SUPPORTING EXHIBIT F UNDER**
44 **SEAL**

45 BRANDTOTAL, LTD., an Israeli
46 corporation, and
47 UNIMANIA, INC., a Delaware
48 corporation,

49 Defendants/Counterclaim
50 Plaintiffs.

1 Pursuant to Civil L.R. 7-11 and Civil L.R. 79-5, Defendants/Counterclaim Plaintiffs
2 BrandTotal, Ltd. and Unimania, Inc. (“BrandTotal”), by and through undersigned counsel,
3 respectfully move for administrative relief to file the Parties’ Discovery Dispute Letter Brief, along
4 with Exhibit F, under seal.

5 Compelling reasons exist for sealing these documents, as the redacted portion of the joint
6 letter brief and the accompanying Exhibit F contain confidential information about Facebook’s
7 reports to the Federal Trade Commission under a consent decree with the Federal Trade
8 Commission. Facebook submits its reports to the Federal Trade Commission confidentially.
9 Accordingly, Facebook requests that the Court allow the joint letter brief and accompanying
10 copy of the October Report to be filed under seal.

11 The proposed sealing is narrowly tailored and only seeks to protect those limited portions
12 of the letter brief that contain sensitive information, and BrandTotal will publicly file a redacted
13 version of the Letter Brief contemporaneously with the filing of this Motion. Exhibit F is marked
14 Highly Confidential – Attorney Eyes Only and should be sealed in its entirety.

15 This Administrative Motion to File Under Seal is accompanied by the supporting
16 Declaration of Michael Chmelar and a [Proposed] Order Granting BrandTotal’s Administrative
17 Motion to File Under Seal. Pursuant to Civil L.R. 79-5, BrandTotal lodges the Requested Sealed
18 Documents with this Court and respectfully requests leave to file them under seal.

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1 Date: January 6, 2021

Respectfully submitted,

2 By: /s/ Rudolph A. Telscher, Jr.
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31 ***Plaintiffs BrandTotal, Ltd. and Unimania,***
32 ***Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January 2021, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record, and to be served via email on all counsel of record at the following:

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